IN THE UNITED STATES BANKRUPTCY COURT Eastern District of Wisconsin

In the Matter of:	}	O N 40 04000
Pamela Street	} }	Case No. 16-24699
	}	Chapter 7
Debtor	}	
Pamela Street	}	
Plaintiff	}	
Vs.	} }	Adversary No.
Mount Mary University, Inc.	} }	
	}	
Defendant(s)	}	

COMPLAINT TO DETERMINE DISCHARGEABILITY OF DEBT

Plaintiff, Pamela Street, brings the instant Complaint to Determine the Dischargeability of a debt owed by the Debtor ("Debtor") to Mount Mary University Inc. (the "Defendant") prior to the filing of the Debtor's petition for relief under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. § 101 et seq (the "Bankruptcy Code"):

- This is an adversary proceeding pursuant to Rule 7001 of the Federal Rules of Bankruptcy
 Procedure and Section 523(a)(8) of the Bankruptcy Code, to determine the
 dischargeability of debt.
- 2. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1334.
- 3. This adversary proceeding constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(F).
- 4. This District is the proper venue for this proceeding pursuant to 28 U.S.C. § 1409.
- 5. Plaintiff, Pamela Street, is the Debtor is the underlying Chapter 7 Bankruptcy filed May 9, 2016.
- 6. Upon information and belief, Defendant has its principal place of business in Wisconsin and is located at 2900 N. Menomonee River Parkway, Milwaukee, WI 53222.

7. Debtor requests a determination that her liability to the above listed creditor is discharged

pursuant to 11 U.S.C. §727.

8. The Defendant was duly listed as a creditor in the above referenced Chapter 7 case.

9. The Debtor attended the Defendant's institution and incurred a debt as a result which

remains unpaid.

10. The debt owed by the Debtor to the Defendant is not a debt that falls under 11 U.S.C.

§523(a)(8) and should not be excepted from discharge.

WHEREFORE, pursuant to Federal Rules of Bankruptcy Procedure 7001 and 11 U.S.C.

Dated: August 12, 2016

§§ 523(a)(8) and 727, the Debtor, by and through her attorneys, respectfully requests this Court

enter an Order declaring the debt owed by the Debtor to Mount Mary University Inc as a

dischargeable debt and grant such other and further relief to the Debtor as may be just and

proper.

/s/ Brett J. Pfeifer

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